

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,)	Civil Action No. 04-264 ERIE
)	Judge Sean J. McLaughlin
Plaintiff)	
)	
v.)	ELECTRONICALLY FILED
)	
CRAWFORD CENTRAL SCHOOL)	
DISTRICT, et al.)	
)	
Defendants)	

**DEFENDANTS' MOTION TO EXTEND DEADLINES
FOR FILING DISPOSITIVE MOTIONS**

AND NOW, this 23rd day of May, 2006, Defendants, Crawford Central School District, Crawford Central School Board, Michael E. Dolecki, Superintendent, and Charles E. Heller, III, Assistant Superintendent, ("Defendants"), by and through their counsel, Knox McLaughlin Gornall & Sennett, P.C., move to extend the deadlines for the filing of dispositive motions in the present matter. In support of their Motion, Defendants state the following:

1. Pursuant to the Court's April 27, 2006 Order, Defendants' Motion for Summary Judgment is due on May 30, 2006.
2. The Court specifically set the deadline for filing dispositive motions to be two (2) weeks following the conclusion of the parties' mediation efforts with Magistrate Judge Susan Paradise Baxter.
3. The parties did mediate with Judge Paradise Baxter on May 16, 2006, with some success. Another mediation session with Judge Paradise Baxter is scheduled for May 30, 2006.
4. Because the deadline for dispositive motions is nearing, the parties are continuing their preliminary preparation of their motion for summary judgment and response, respectively.

5. Defendants respectfully request that the Court lift the May 30, 2006 deadline for the filing of Defendants' Motion for Summary Judgment, to be rescheduled for two (2) weeks following the cessation of Judge Baxter's efforts to mediate this case.

6. Plaintiff's counsel has given her consent to Defendants' representing to the Court that Plaintiff supports this motion.

WHEREFORE, Defendants, Crawford Central School District, Crawford Central School Board, Michael E. Dolecki, Superintendent, and Charles E. Heller, III, Assistant Superintendent, respectfully request that the Court grant their Motion to Extend Deadlines for Filing Dispositive Motions and lift the May 30, 2006 filing deadline, with a new deadline to be scheduled for two (2) weeks following the cessation of Judge Susan Paradise Baxter's efforts to mediate a resolution of this case, if necessary.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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